



Redmayne
Bentley



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

PURPOSE AND SCOPE

This statement is made in compliance with Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and associated regulations and statutory guidance. The Firm’s revenue exceeded the relevant threshold under the Act in the 2023/24 financial year.

Consequently, this is the first statement that Redmayne Bentley LLP (“we”, “us”, “our”, the “Firm”) has been required to produce under the Act.

The purpose of this document is to confirm what we are doing to monitor and ensure modern slavery, human trafficking and associated activities are not present in the Firm’s supply chains.

WHAT IS MODERN SLAVERY AND HUMAN TRAFFICKING?

Modern slavery, servitude, forced labour and human trafficking are international crimes which annually affect millions of people worldwide.

Slavery is essentially where one person treats another as their property. Servitude is much broader than slavery and includes both one person providing certain services to another and may also include restrictions on their freedom.

Forced or compulsory labour is any work or service exacted from a person under the threat of a penalty and which that person has not volunteered for¹.

Human trafficking is where person arranges or facilitates the travel of another person to exploit them.

WHAT STEPS HAS THE UK TAKEN TO STOP OR REDUCE THE IMPACT OF THESE CRIMES?

Unfortunately, vulnerable individuals and families continue to be exploited in this way both in the UK and worldwide. The UK first enacted anti-slavery legislation in the Abolition Act 1807, but the most relevant legislation is, among other things:

- The Human Rights Act 1998, under which Article 4 sets out the principle that no one shall be held in slavery or servitude, or required to perform forced or compulsory labour);
- The UK’s accession to the Forced Labour Convention, 1930 (No. 29); and
- The Modern Slavery Act 2015.

REDMAYNE BENTLEY LLP’S BUSINESS, PURPOSE AND VALUES

Redmayne Bentley LLP is committed to combating modern slavery and human trafficking. We have a zero-tolerance approach to modern slavery and human trafficking in our supply chain.

The Firm’s vision is to be the most trusted independent provider of personal investment services. We conduct business in a way which reflects our values of excellence, integrity, responsibility, respect and teamwork.

Verifying modern slavery is not present in our supply chain is not just a matter of complying with the law but also ensuring that as a Firm we are acting in accordance with our values.

OUR FIRM’S STRUCTURE, GOVERNANCE AND SUPPLY CHAINS

Structure

Redmayne Bentley LLP is a limited liability partnership incorporated in England and Wales (registration no: OC344361) and whose registered address is 3 Wellington Place, Leeds LS1 4AP. We are Authorised and Regulated by the UK’s Financial Conduct Authority. Our Head Office is in Leeds and we operate across the UK via our branch network, which includes franchises. This statement covers the activities of our Head Office and all branches in the Firm’s network.

The core of our business relies on people to deliver excellent investment and wealth management services to our clients. We therefore strive to have a culture, as well as appropriate policies and procedures in place, that secures fair treatment of all staff.

¹ Definitions are from the College of Policing [here](#).

Governance

The Firm is governed by a Main Board and an Executive Board which together have overall responsibility for the Firm's activities. These boards are comprised of executive designated members, non-executive directors, and directors with responsibility for each business area. Stuart Davis is the Chief Executive Officer and a designated member of the Firm.

Supply chains

Due to the nature of the Firm's business, our external suppliers are principally based in the UK and in low-risk sectors (such as professional services). We have some suppliers which operate in the hospitality and transport sectors which are a potentially higher risk. We have a very limited number of suppliers outside the UK, and these are based in lower-risk jurisdictions (e.g. the USA).

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

We have a zero-tolerance approach to breaches of anti-modern slavery and anti-trafficking legislation. If we discover breaches of these laws within our supply chain, we will engage with those suppliers to achieve compliance or seek alternative compliant providers. When procuring services, we look to suppliers with similar values and their approach to compliance (both in general terms and in respect of anti-slavery legislation).

As this is the first year a statement has been required, the Firm is presently conducting a detailed review of relevant policies and its third-party contracts for compliance with the Act.

However, the Firm has sought to address the crimes covered by the Act in its supply chain including:

- Developing a Modern Slavery Policy for our staff, setting out an overview of the crimes covered by the Act and how they should respond to them;
- Reminding staff of our whistleblowing policy so that they can raise issues with senior independent board members;
- Extending the Firm's complaints procedure to include complaints not just related to our regulated activities, but also third parties who wish to raise other concerns e.g. regarding modern slavery;
- Employment policies and procedures that safeguard staff from unfair, unethical or unlawful treatment;
- Annual staff pay reviews and ongoing monitoring of pay issues, including compliance with UK minimum wage laws;
- Procurement processes setting out how we engage and manage our third-party suppliers. Where appropriate, we will put in place a suppliers' code of conduct and/or carry out regular audits; and
- Providing staff with appropriate training on modern slavery and the Act.

DUE DILIGENCE PROCESSES

Our procurement processes set out the due diligence processes we follow to identify, assess, and mitigate the risks of modern slavery and human trafficking within our supply chain. For example, where a higher risk supplier is identified, we may choose an alternative more costly but transparent supplier, and/or put in place suitable contractual obligations.

When new branches seek to join our network or other businesses are acquired, a thorough due diligence process is carried out to identify any breaches or risks which need to be managed and/or confirm that the branch or business' culture and day-to-day practices reflect legislation and our values.

The Modern Slavery Policy highlights any specific risk areas and the steps we take to address them, including having due regard to the [UN Guiding Principles on Business and Human Rights](#) (UNGPs).

KEY PERFORMANCE INDICATORS (KPIs)

The Firm maintains a register of complaints in line with its obligations under its FCA authorisation. Up to the date of this statement, the Firm has received no complaints regarding modern slavery or related concerns (either before or after the Act's requirements applied to us).

The Firm operates a register of its key supplier contracts which, among other things, includes compliance with the Act and with the Firm's procurement processes. The register is reviewed at least annually and the Firm's boards receive relevant information about any specific concerns, issues or good practice.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

The majority of the Firm's staff are required to undertake continuing professional development training under the Senior Managers and Certification Regime. The Firm has procured and introduced mandatory training modules for staff in respect of Modern Slavery and related areas (e.g. whistleblowing and employment policies), which colleagues will initially undertake annually.

EFFECTIVENESS AND REVIEW OF MEASURES

The Modern Slavery Policy, the procurement processes and other relevant policies and procedures are reviewed for their effectiveness at least annually (and more frequently if required).

This statement will be reviewed and updated annually to reflect any changes in the Firm's obligations, policies, or risk management processes.

If a breach or an issue were to occur, a risk event would be raised and managed in accordance with Firm's risk management framework and policy. Following such an event, the Firm would seek to resolve the issue and evaluate its procedures to put in place appropriate controls to manage the risk of reoccurrence.

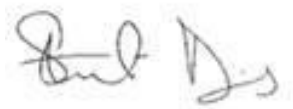
FURTHER INFORMATION OR TO RAISE A CONCERN

If you want further information or have a concern regarding modern slavery and the Firm's activities, please contact us at info@redmayne.co.uk or call 0113 243 6941.

PUBLICATION AND APPROVAL OF THIS STATEMENT

This statement will be published on the Firm's website with a clear link on the homepage.

This statement has been approved by Stuart Davis, CEO and Designated Member of Redmayne Bentley LLP, on behalf of the Firm.



Stuart Davis

CEO, Redmayne Bentley LLP

March 2025